

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT INDIANA**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>1:12-cv-01117-WTL-MJD</u>
	)	
v.	)	
	)	
MICHAEL HARRISON,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF’S PROPOSED SPECIAL INTERROGATORIES AND GENERAL  
VERDICT FORM**

Plaintiff, Malibu Media, LLC, pursuant to Fed. R. Civ. P. 49(b), respectfully submits the attached proposed Special Interrogatories and General Verdict Form.

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FOR THE SOUTHERN DISTRICT INDIANA**

MALIBU MEDIA, LLC,	)	
	)	
Plaintiff,	)	Civil Case No. <u>1:12-cv-01117-WTL-MJD</u>
	)	
v.	)	
	)	
MICHAEL HARRISON,	)	
	)	
Defendants.	)	
_____	)	

**SPECIAL INTERROGATORIES AND GENERAL VERDICT FORM**

**I. Definitions**

1. "Works" shall mean and refer to the copyrighted films at issue in this lawsuit, specifically: (1) Veronica Wet Orgasm, (2) Introducing Diana, (3) Pretty Back Door Baby, (4) LA Love, (5) Romantic Memories, and (6) Sneak N Peek.
2. Applicable Time Period: June 3, 2012 to September 30, 2012.

**II. Special Interrogatories**

We the jury, upon our oath, give the following answers to the Court's questions:

**A. Did Plaintiff prove by a preponderance of the evidence that:**

1. Plaintiff owns the copyrights to Veronica Wet Orgasm, Introducing Diana, Pretty Back Door Baby, LA Love, Romantic Memories, and Sneak N Peek, collectively the "Works"?

**Answer (Yes or No):** \_\_\_\_\_

2. Plaintiff did not authorize Defendant to use BitTorrent to download and distribute its Works?

**Answer (Yes or No):** \_\_\_\_\_

3. IP Address 98.220.43.119 was used to distribute copies of the Works via the BitTorrent protocol?

**Answer (Yes or No):** \_\_\_\_\_

4. Comcast assigned IP Address 98.220.43.119 to Defendant on July 30, 2012?

**Answer (Yes or No):** \_\_\_\_\_

5. Defendant used IP Address 98.220.43.119 during the Applicable Time Period to connect to the Internet from his home address?

**Answer (Yes or No):** \_\_\_\_\_

6. Defendant's Internet was password protected and encrypted during the Applicable Time Period?

**Answer (Yes or No):** \_\_\_\_\_

7. Defendant lived alone during the Applicable Time Period?

**Answer (Yes or No):** \_\_\_\_\_

8. No one visited Defendant with sufficient frequency during the Applicable Time Period to be the infringer.

**Answer (Yes or No):** \_\_\_\_\_

9. No one heard, saw, smelled, tasted or touched a third party use BitTorrent via Defendant's Internet?

**Answer (Yes or No):** \_\_\_\_\_

[Remainder of page intentionally left blank]

### **III. General Verdict**

We the jury, upon our oath, give the following verdict, based upon a preponderance of the evidence:

1. Defendant used BitTorrent to download or distribute:

a. Veronica Wet Orgasm

**Answer (Yes or No):** \_\_\_\_\_

b. Introducing Diana

**Answer (Yes or No):** \_\_\_\_\_

c. Pretty Back Door Baby

**Answer (Yes or No):** \_\_\_\_\_

d. LA Love

**Answer (Yes or No):** \_\_\_\_\_

e. Romantic Memories

**Answer (Yes or No):** \_\_\_\_\_

f. Sneak N Peek

**Answer (Yes or No):** \_\_\_\_\_

2. If your answer to any part of question 1 is “yes,” do you find that Defendant intentionally downloaded or distributed Plaintiff’s Works without regard to Plaintiff’s rights?

**Answer (Yes or No):** \_\_\_\_\_

Dated: \_\_\_\_\_

\_\_\_\_\_ (Foreperson)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_